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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

PQ LABS, INC.,

Plaintiff,

v.

YANG QI, ZAAGTECH INC., JINPENG LI,
and HAIPENG LI,

Defendants.

Case No.: 12-CV-00450-CW

**STIPULATED REQUEST AND ORDER TO
EXTEND DEADLINE TO CONDUCT
MEDIATION**

STIPULATED REQUEST TO EXTEND DEADLINE TO CONDUCT MEDIATION

Pursuant to ADR LR 6-5, Plaintiff PQ Labs, Inc. (“Plaintiff” and “PQ Labs”) and Defendants Yang Qi, Zaagtech Inc. (“Zaagtech”), Jinpeng Li, and Haipeng Li (“Defendants”), by and through their respective counsel, hereby stipulate and request that the deadline to conduct mediation be extended to December 31, 2013.

On October 14, 2013, the parties submitted a joint request to be excused from physical attendance at mediation to the ADR Magistrate Judge, Hon. Maria-Elena James pursuant to ADR LR 6-10(d). The parties based their request on, among other things, the fact that the individual Defendants Yang Qi and Jinpeng Li, and the company representative of Defendant Zaagtech and the company representative of Plaintiff PQ Labs all reside in China and personal attendance at mediation

in the Bay Area would impose a substantial hardship in terms of time and expense of travel. The parties' joint request was denied on October 22, 2013. As Yang Qi, Jinpeng Li, the company representative of Zaagtech, and the company representative of PQ Labs are presently located in China and cannot make travel arrangements from China to the Bay Area on extremely short notice to satisfy the pending mediation deadline, the parties are not available and not able to conduct a mediation before the October 31, 2013 deadline. Further extension of the mediation deadline was recommended by the ADR Magistrate Judge, Hon. Maria-Elena James in the order denying the parties' request to be excused from physical attendance.

Plaintiff and Defendants concur in this Request. The appointed mediator Michael Sobel has been informed of the parties' intention to seek extension of the mediation deadline and is being served with a copy of this Request. A copy of this Request is also being served to the ADR Unit.

Based on the foregoing, the parties respectfully request that the Court extend the deadline to conduct mediation to December 31, 2013.

Pursuant to Civil LR 5-1(i)(3), the filer hereby attests that concurrence in the filing of this document has been obtained from each signatory below as indicated by "/s/".

Dated: October 25, 2013

Dated: October 25, 2013

By: /s/ Otto O. Lee

By: /s/ Perry J. Narancic

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Attorneys for Plaintiff PQ Labs, Inc.

Attorney for Defendants Yang Qi, Zaagtech
Inc., Jinpeng Li, and Haipeng Li

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 10/25/2013


HON. CLAUDIA WILKEN
United States District Judge

CERTIFICATE OF SERVICE

I certify that on October 25, 2013, I electronically filed the foregoing **STIPULATED REQUEST AND [PROPOSED] ORDER TO EXTEND DEADLINE TO CONDUCT MEDIATION** using the Court's CM/ECF system, which will provide service by email to the following parties:

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